

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IN RE THALOMID AND REVLIMID
ANTITRUST LITIGATION**

Civil No. 14-6997 (MCA) (MAH)

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND PAYMENT OF SERVICE
AWARDS TO THE CLASS REPRESENTATIVES**

PLEASE TAKE NOTICE that at the Fairness Hearing set by the Court on September 30, 2020, the undersigned, counsel for Plaintiffs and the proposed Settlement Class, will move before the Hon. Madeline Cox Arleo, U.S.D.J., at the Martin Luther King Federal Building & Courthouse, 50 Walnut Street, Newark, NJ 07102, for an Order granting the following relief:

1. Plaintiffs' Counsel shall receive attorneys' fees to be paid from the Settlement Fund in the amount of \$11,333,333.33 plus one-third of the interest earned in the Settlement escrow account.

2. Plaintiffs' Counsel shall be reimbursed \$3,613,490.78 out of the Settlement Fund for the expenses they incurred in the prosecution of this complex lawsuit.

3. Plaintiffs' Co-Lead Counsel shall allocate the fees and expenses among all of Plaintiffs' Counsel in a manner that Co-Lead Counsel in good faith believe reflects the contributions of each firm working for Plaintiffs and the Class in the prosecution and settlement of the claims against the Defendant in this action.

4. The Class Representatives shall be awarded service awards in the following amounts as requested by Co-Lead Counsel:

- a. \$10,000 for International Union of Bricklayers and Allied Craft Works Local 1 Health Fund;
- b. \$10,000 for City of Providence;
- c. \$10,000 for International Union of Operating Engineers Local 39 Health and Welfare Trust Fund;
- d. \$10,000 for The Detectives' Endowment Association, Inc.;
- e. \$10,000 for David Mitchell; and
- f. \$10,000 for New England Carpenters Health Benefits Fund.

The undersigned intends to rely on the Memorandum of Law filed contemporaneously herewith, as well as the Declaration of Co-Lead Counsel Melinda R. Coolidge and the exhibits thereto. A form of proposed Order is also included herewith.

The undersigned hereby request oral argument.

Dated: August 7, 2020

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